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9 **UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

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11 In re:

12 **PG&E CORPORATION,**

13 **- and -**

14 **PACIFIC GAS AND ELECTRIC COMPANY,**

15 **Debtors.**

16 Affects PG&E Corporation
 Affects Pacific Gas and Electric Company
 Affects both Debtors

17 * *All papers shall be filed in the Lead Case,
No. 19-30088 (DM).*

18 Case No. 19-30088 (DM)
Chapter 11
(Lead Case)
(Jointly Administered)

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20 **STIPULATION REGARDING
BRIEFING SCHEDULE AND
CONTINUED HEARING WITH
RESPECT TO CLAIM NO. 56868
(CALIFORNIA DEPARTMENT OF
HOUSING AND COMMUNITY
DEVELOPMENT)**

21 [Related to Dkt. No. 10808]

This stipulation (the “**Stipulation**”) is hereby entered into between PG&E Corporation (“**PG&E Corp.**”) and Pacific Gas and Electric Company (the “**Utility**”), as debtors and reorganized debtors (collectively, the “**Debtors**” or the “**Reorganized Debtors**”) in the above-captioned cases (the “**Chapter 11 Cases**”), on the one hand, and the California Department of Housing and Community Development (the “**Department**”), on the other hand, by and through their respective counsel. The Reorganized Debtors and the Department are referred to in this Stipulation collectively as the “**Parties**,” and each as a “**Party**.” The Parties hereby stipulate and agree as follows:

RECITALS

A. On January 29, 2019 (the “**Petition Date**”), the Debtors commenced these Chapter 11 Cases in the United States Bankruptcy Court for the Northern District of California (the “**Bankruptcy Court**”). The Chapter 11 Cases are being jointly administered for procedural purposes only pursuant to Rule 1015(g) of the Federal Rules of Bankruptcy Procedure.

B. On October 10, 2019, the Department filed Claim No. 56868, which asserted a secured claim in the amount of \$330,432.00 (the “Claim”).

C. On June 30, 2020, the Court entered the *Order Approving (A) Procedures for Filing Omnibus Objections to Claims and (B) the Form and Manner of the Notice of Omnibus Objections* (the “**Omnibus Objections Procedures Order**”).

D. On June 17, 2021, the Reorganized Debtors filed the *Ninety-Third Omnibus Objection to Claims (No Legal Liability Claims)* [Docket No. 10808] (the “**Omnibus Objection**”).

E. The Omnibus Objection objects to the claim on the basis that it should be reduced because it is barred in part by certain California statutes of limitations for statutory liability and penalties (the “**Statute of Limitations Objection**”).

F. On July 14, 2021, the Department filed the *California Department of Housing and Community Development’s Response to PG&E’s Objection to Proof of Claim No. 56868* [Docket No. 10918] (the “**Response**”).

G. The Omnibus Objection is currently set for hearing on July 28, 2021, at 10:00 a.m. (Pacific Time) (the “**Hearing**”).

H. The Parties met and conferred and agreed upon a schedule regarding further briefing and continuing the Hearing with respect to the Statute of Limitations Objection as it relates to the Claim.

I. The Parties agree that there are no issues of fact for the Court to determine in order to adjudicate the Omnibus Objection with respect to the Statute of Limitations Objection, and that no evidentiary hearing will be necessary.

NOW, THEREFORE, UPON THE FOREGOING RECITALS, WHICH ARE INCORPORATED AS THOUGH FULLY SET FORTH HEREIN, IT HEREBY IS STIPULATED AND AGREED, BY AND BETWEEN THE PARTIES, THROUGH THE UNDERSIGNED, AND THE PARTIES JOINTLY REQUEST THE BANKRUPTCY COURT TO ORDER, THAT:

1. On or before August 31, 2021, the Reorganized Debtors shall file a reply in support of the Statute of Limitations Objection to the Claim, not to exceed 25 pages.

2. On or before September 7, 2021, the Department shall file a sur-reply in support of its Response, not to exceed 15 pages.

3. The Hearing shall be continued to September 14, 2021, at 10:00 a.m. (Pacific Time), where the Parties will be prepared for oral argument on the Statute of Limitations Objection.

4. No evidentiary hearing on the Statute of Limitations Objection will be set without further order of the Court.

5. The Parties reserve all rights, arguments, and defenses with respect to the Claim, including with respect to any other grounds on which the Reorganized Debtors may object to the Claim apart from the Statute of Limitations Objection.

6. The Court shall retain jurisdiction to resolve any disputes or controversies arising from this Stipulation or any Order approving the terms of this Stipulation.

[Signatures on Next Page]

1 Dated: July 20, 2021

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3 KELLER BENVENUTTI KIM LLP

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5
6 */s/ Jane Kim*

7 _____
8 Jane Kim

9 *Attorneys for Debtors
and Reorganized Debtors*

10 Dated: July 20, 2021

11 ROB BONTA
12 Attorney General of California
13 JAMEE PATTERSON
14 Supervising Deputy Attorney General

15 */s/ Erica B. Lee*

16 _____
17 ERICA B. LEE
18 Deputy Attorney General
19 *Attorneys for the California Department of
Housing and Community Development*